

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

RICHARD W. JOHNSON, JR. and
ALYSE M. JOHNSON

Debtors

CHAPTER 11

Case No. 20-10054

**NOTICE OF AGENDA OF DEBTORS' CONTESTED AMENDED PLAN
CONFIRMATION HEARING ON NOVEMBER 18, 2021 AT 10:00 A.M.**

Filed Objections to Debtors' Amended Plan

1. Bancorp Bank (*Dkt. No. 46*) – ***resolved by parties through curing of mortgage arrearages in Amended Plan as set forth in Article 4.01, Class 2.***
2. Office of United States Trustee (*Dkt. No. 49*)
 - a. Future income projections – ***still pending***
 - b. Inclusion of remedies – ***addressed in Article 10(2) of Amended Plan***
 - c. Sub V Trustee continue and make distributions – ***still pending, although Debtors have addressed Sub V Trustee involvement post-confirmation in Article 10(1) of Amended Plan; Debtors and Sub V Trustee also have agreed on confirmation order language, although not yet submitted***
3. Internal Revenue Service (*Dkt. No. 50*)
 - a. Improperly states IRS claim – ***addressed in Article 3.03 of Amended Plan***
 - b. Unfiled 2020 return – ***Debtors have filed their 2020 return***
 - c. Does not pay priority and secured claims in full – ***addressed in Article 3.03 of Amended Plan***
 - d. Does not provide for regular payments – ***addressed in Article 3.03 of Amended Plan, but not as requested by IRS***
 - e. Does not provide for retention of IRS liens – ***addressed in Article 3.03 of Amended Plan***
 - f. No default clause– ***addressed in Article 10(2) of Amended Plan***

- g. Feasibility – *still pending*
- 4. Pennsylvania Department of Revenue (*Dkt. No. 84*) – joinder to IRS objection
 - a. Fails to provide for regular installments – *addressed in Article 3.03 of Amended Plan, but not as requested by Revenue*
 - b. Feasibility – *still pending*
 - c. Lack of information – *still pending*

SMITH KANE HOLMAN, LLC

Dated: November 17, 2021

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